

HUSCH BLACKWELL

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May 10, 2021

Via Certified Mail Return Receipt Requested

Freedom of Information Act Officer
United States Environmental Protection Agency
Regional Freedom of Information Officer
11201 Renner Boulevard
Lenexa, Kansas 66219

Re: Freedom of Information Act Request
Hayford Bridge Road Groundwater Site, St. Charles, Missouri

Dear FOIA Officer:

Pursuant to the Freedom of Information Act (the “Act”), 5 U.S.C. § 552 (“FOIA”), and 40 C.F.R. § 2.100 et seq., we hereby request from the United States Environmental Protection Agency (“EPA”), copies of the following documents or records prepared, received, or possessed by any and all EPA personnel, contractors, and agents:

1. Any and all documents or records provided by Findett Real Estate Corporation, or any entity associated with Findett Real Estate Corporation, related to Findett Real Estate Corporation’s ability-to-pay for the continued operation and maintenance of the on-site groundwater extraction and treatment system at the Findett Corporation Site, Operable Unit 01, in the city of St. Charles, St. Charles County, Missouri;
2. Any and all documents or records provided by George E. Garrison and/or Findett Corporation, Findett Properties LLC, Findett Real Estate Corporation, Arch Technology Holdings LLC, and Sylvan Partners LLC in response to EPA’s January 2021 CERCLA 104(e) requests; and
3. Any and all documents or records provided by SantoLubes Manufacturing, LLC in response to EPA’s February 2021, CERCLA 104(e) request.

HUSCH BLACKWELL

Freedom of Information Act Officer

May 10, 2021

Page 2


4. Any and all additional documents or records, however obtained, regarding the ownership, purchase, or sale of any interest in, or assets of Findett Real Estate Corporation, Findett Services Company, Findett Corporation, Findett Properties LLC, Findett LLC, SantoLubes LLC, Santovac Fluids, LLC, SantoTrac Traction Lubricants, The Harvest Group, Sylvan Partners LLC, and Arch Technology Holdings LLC.

In this request, the terms “documents” or “records” include all paper and all electronic documents, any type of written or electronically stored information or data, and/or any other materials, including, but not limited to all correspondence, inspection records, citations, notes, general field notes, inspector notes, investigator notes, interview notes, transcripts, memoranda, telephone records, records of teleconferences, calendar entries, photographs (in native format, if possible), permits, maps, studies, data compilations, analyses, test results, laboratory notes or reports, transcripts, investigative materials, e-mail or other electronic or written or typed correspondence, video or audio recordings, or any other material responsive to this request that has been memorialized in writing or by other means of data recordation, including all cover letters or transmittal notes attached to any responsive documents.

Please provide your response to this request within twenty (20) working days as prescribed by 40 C.F.R. § 2.104(a). To the extent that any of the requested documents or records cannot be located, reviewed, and released within the requisite twenty working days, I ask that you not delay the release of those documents or records that can be located, reviewed, and released. I further request, pursuant to *Vaughn v. Rosen*, 484 F.2d 820 (D.C. Cir. 1973), that you provide me with a detailed index describing each requested document or record that EPA is not releasing pursuant to this request. In addition, please review each of those documents you believe contains material that EPA may withhold. If, based on such review, you determine that only a portion of a document is exempt from FOIA’s disclosure requirements, please provide the balance of such documents to me.

I appreciate your cooperation. If you have any questions or need any additional information concerning any of the material sought, do not hesitate to contact me. We will pay up to \$150.00 for copies of responsive documents. If the cost of responding to this request will exceed that amount, please call me at the number above prior to copying any records.

Best regards,



Jason A. Flower
Partner